



Valuing Complaints & Feedback Policy

**November 2019
November 2022**

This policy applies to

- | | | | |
|--|--|---|---|
| <input checked="" type="checkbox"/> Link Group | <input checked="" type="checkbox"/> Link Housing | <input type="checkbox"/> Link Living | <input checked="" type="checkbox"/> Link Property |
| <input checked="" type="checkbox"/> Horizon | <input checked="" type="checkbox"/> Larkfield | <input checked="" type="checkbox"/> West Highland | <input checked="" type="checkbox"/> Lintel Trust |

Policy Summary

This policy explains how we respond to and use complaints and feedback to monitor and improve services. Complaints are a way to identify problems, reduce mistakes, increase value and make sure we are delivering a service our customers need. This policy covers all Link customers, including tenants, factored owners, access owners, sharing owners, mid-market and market tenants. When we refer to 'Link' in this policy we mean all the subsidiaries of Link, ticked above. It also covers members of the public, friends or family members who want to complaint about a service Link provides or complaints relating to contractors providing services on our behalf.

Equalities

This policy complies with Link's Equality, Diversity and Inclusion Policy. An equalities impact assessment has been carried out. We are committed to making sure our services are accessible and that people are treated fairly and respectfully when making a complaint. This policy is available in audio, alternative formats, languages or braille on request. We will work with people who wish to make a complaint to access the support they require to do so. We treat complaints relating to accusations of discrimination seriously and staff are trained to deal with this appropriately.

Privacy

This policy complies with Link's Data Protection Policy and General Data Protection Regulations (GDPR). Staff are trained in GDPR responsibilities and a Privacy Impact Assessment has been completed.

Policy Owner

Director of Human
Resources and Business
Support

Review Manager

Strategy and Business
Support Officer

Approved By

Link Group Board

Revision History

Date	Version Number	Comments
September 2019	3	A policy to comply with Scottish Public Services Ombudsman (SPSO) Model Complaint Handling Procedure has been in operation since March 2013.

1. INTRODUCTION

This policy explains how Link responds to and uses complaints and feedback to monitor and improve services. Complaints are a way to identify problems, reduce mistakes, increase value and make sure we are delivering a service our customers need.

2. PRINCIPLES

The following principles govern the operation of this policy:

- Complaints and feedback about our services are valued and welcomed.
- Complaints will always be recorded, analysed and actioned appropriately.
- Complaints should be resolved quickly at the frontline where possible.
- Frontline staff are empowered to make appropriate decisions when dealing with reasonable requests from customers.
- Customers will be treated fairly, with respect and empathy when reporting complaints.
- Complaints are an indicator of service quality and can highlight failures, poor value for money, reputational risk and customer safety concerns.
- Lessons learned from complaints are a way of improving services.

3. OBJECTIVES

The objectives of this policy are to:

- Comply with the principles of the two-stage SPSO Model Complaints Handling Procedure (MCHP) and any other legal or contractual obligations in relation to complaints.
- Provide clear and accessible information on how to complain and provide feedback and make it easy for customers to do so.
- Embed a culture of learning lessons from complaints and share this throughout the organisation and with customers.
- Provide clear and accurate decisions on the outcomes of complaints and how to escalate complaints.
- Apply a consistent approach to complaints covering all customers.

4. SCOTTISH SOCIAL HOUSING CHARTER (CHARTER), REGULATORY AND LEGAL CONTEXT

The following Charter outcomes, regulatory requirements or legislation relate to this policy:

- The Scottish Housing Regulator's (SHR) regulatory requirement is for an RSL to comply with guidance from the Scottish Public Services Ombudsman (SPSO) and to ensure it has effective arrangements to learn from complaints.

- Standard 2 of the SHR's Standards of Governance and Financial Management for RSLs, which requires an RSL to be open and accountable for what it does.
- All Charter outcomes and particularly numbers one, two and six relating to equalities, communication and estate management, include complaints as indicators of Charter performance.
- The First-tier Tribunal for Scotland (Housing and Property Chamber) provides redress in certain circumstances for customers affected by the Letting Agent Code of Practice and the Factoring Code of Conduct.
- Equalities Act (2010) which states reasonable adjustments will be made to remove any barriers for customers to make complaints about services Link provides.
- Freedom of Information (Scotland) Act 2002 – Complaints performance information is part of the publication scheme.

5. APPROACH AND METHOD

The Link Group Board and subsidiary boards in their approval of the policy acknowledges they accept full responsibility for its implementation. Day-to-day responsibility for the operation of this policy lies with the appropriate directors and managers of the Link group of companies. All relevant employees have a responsibility to ensure that this policy is applied as instructed. Serious complaints against the Chief Executive Officer follow a separate policy and procedure.

The policy will be implemented using the following approaches:

- The SPSO MCHP will be adopted as the Link Group Complaints Handling Procedure (CHP) and any updates published by the SPSO will be adopted. A summary procedure will be attached to this policy and operational procedures published.
- Effective systems are in place to record and report consistently on complaints.
- Customers can complain in a range of ways to suit their communication preferences. Information of how to complain is published on our website and a customer leaflet will be produced.
- Complete records of how complaints are handled will be kept assisting investigations that may be escalated.
- Staff will be trained regularly so they have the right skills and confidence to handle complaints effectively. Managing and dealing with complaints form part of the core training matrix for relevant staff. Information on Link CHP will be provided to new staff at induction and on Linkipedia (staff intranet). Staff who are complained about will be supported and, where possible, informed before responding and of the outcome.
- This policy applies to contractors and managing agents delivering services on Link's behalf.
- The Unacceptable Actions Policy will be attached to the complaints policy to set out how we will deal with inappropriate customer behaviour.
- Customers are encouraged to make a complaint as soon as possible and usually within six months of the event they wish to complain about. We will consider complaints up to one year after the event.

6. POLICY MONITORING

Any serious failure of internal controls will be reported immediately to the Chief Executive.

The following activities will be monitored in support of this policy;

- Quarterly complaints KPI reports to Senior Management Group and Link Group Board including alerts if Stage 1 complaints increase by 10% compared to the same period in the previous year.
- Sample quality assurance checks will be carried out to monitor application of the CHP.
- Horizon, Larkfield and West Highland Housing Associations report complaints performance to their boards to provide detailed reporting on trends and themes. In the event of complaints targets not being met within the group more detailed commentary will be provided to Link Group Board.
- Staff and customer feedback will be sought to review and improve procedures at least every 3 years.
- Complaints performance will be reported at least annually to customers by newsletter or on the website including;
 - Total number of stage one and stage two complaints received
 - Average number of days taken to respond
 - % responded to in full
 - % upheld and benchmark comparisons against national averages will be reported.
 - Feedback will be analysed to monitor the services and types of complaints and frequency and lessons learned recorded.
 - Any mandatory revisions to SPSO performance indicators.
- The number of complaints referred to and upheld by the SPSO or other authorities listed on page 6 will be monitored.
- Charter indicators 3 and 4 will be reported annually to SHR.
- Employees and Board members have a responsibility to promote and uphold the requirements of this policy. Any material breach of the policy will be considered under our disciplinary procedures and may result in a disciplinary action being taken.
- The policy may be audited by the Internal Auditor to assess compliance and any findings reported to the Risk and Audit Committee and Senior Management Group.

7. COMPLAINTS TIMESCALES AND ESCALATION

The CHP allows for most complaints to be resolved by Link front line staff within a five working day limit (Stage 1), or if the complaint is complex, or if the customer remained dissatisfied, following the front line resolution, a detailed investigation will

be made by a manager within a 20-working day limit (Stage 2). The Director of the subsidiary will respond to the Stage 2 complaint, or if appropriate, the Chief Executive.

There is a different complaints procedure for the LIFT Open Market Shared Equity and Help to Buy (Scotland) schemes, which we administer on behalf of the Scottish Government. We will acknowledge these complaints within one working day and provide a response within two working days, or an update will be provided on the expected resolution date.

Anyone receiving care or support service from us has the right to complain either direct to the Care Inspectorate or to us.

At each stage Link will advise the customer how the complaint should be taken forward and advise which organisation is appropriate to consider the case. If a customer is not satisfied with our response after being through Stage 1 and Stage 2 of the Link CHP they can escalate to the following authorities;

Customer	Contact details
Housing association tenant, applicant or access owner	Scottish Public Sector Ombudsman 0800 377 7330
Private Sector Leasing tenant	Edinburgh City Council customer.care@edinburgh.gov.uk 0131 200 2300 Or Scottish Public Sector Ombudsman 0800 377 7330
Sheltered housing tenants	Scottish Public Sector Ombudsman 0800 377 7330 Or Care Inspectorate 01382 207100
Factoring customers	First-tier Tribunal for Scotland Housing and Property Chamber 0141 302 5900
Link2Let customers	Housing and Property Chamber First-tier Tribunal for Scotland for Scotland 0141 302 5900 Landlord Accreditation Scotland 0131 553 2211
Help to Buy (Scotland) Affordable New Build Scheme	Scottish Government More Homes Division, Victoria Quay, EH6 6QQ 0300 244 400
LIFT Open Market Shared Equity (OMSE) scheme	Scottish Government More Homes Division, Victoria Quay, EH6 6QQ 0330 3030125

New Supply Shared Equity (NSSE)	As detailed in your Build Warranty and thereafter; The Consumer Code for Home Builders Independent Dispute Resolution Scheme
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8. SIGNIFICANT PERFORMANCE FAILURES

A significant performance failure (SPF) occurs if Link fails to do something or takes action that puts tenants' interests at risk and it will affect many or all of Link's tenants. A SPF is not an individual tenant complaint about a service. This applies to Link's social landlord tenants only. If a tenant is aware of a significant performance failure it should report this to the Chief Executive. If they are dissatisfied with Link's response then the matter will be referred to the Scottish Housing Regulator.

9. POLICY AVAILABILITY

Link will produce this information on request in Braille, audio, large print and other languages on request to find out more call 0330 303 0124. The policy is available on our website and in audio format using BrowseAloud on our website.

10. POLICY REVIEW

Link Group undertake to review this policy regularly, at least every three years, regarding:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

ستصدر Link هذه المعلومات عند الطلب بطريقة برايل وشريط صوتي وطباعة عريضة ولغات الأقليات. لمعرفة المزيد يرجى الاتصال بالرقم 0330 303 0124.

Link এই তথ্যাবলীকে অনুবোধক্রমে ব্রেইল, অডিও টেপ, বড় হবফের মুদ্রন ও কমিউনিটির ভাষাগুলিতে প্রস্তুত করে থাকে। আবারো জানার জন্য অনুগ্রহ করে, 0330 303 0124 নম্বরে কল করুন।

Link将以盲文、录音磁带、大号字体和社区语言的要求提供此信息。欲了解更多详情，请致电 0330 303 0124。

Na żądanie, Link może udostępnić niniejsze informacje w wersji pisanej alfabetem Braille'a, na taśmie magnetofonowej, w formie dużego druku oraz w językach używanych przez mieszkańców społeczności. Aby uzyskać więcej informacji, prosimy zadzwonić pod numer 0330 303 0124.

ਬੇਨਤੀ ਕਰਨ 'ਤੇ Link ਇਸ ਜਾਣਕਾਰੀ ਨੂੰ ਬ੍ਰੇਲ, ਆਡੀਓ ਟੇਪ, ਵੱਡੇ ਅੱਖਰਾਂ ਅਤੇ ਭਾਈਚਾਰੇ ਦੀਆਂ ਭਾਸ਼ਾਵਾਂ ਵਿੱਚ ਪੇਸ਼ ਕਰਦਾ ਹੈ। ਹੋਰ ਜਾਣਕਾਰੀ ਲਈ ਵਿਰਧਾ ਕਰਕੇ 0330 303 0124 'ਤੇ ਕਾਲ ਕਰੋ।

درخواست کرنے پر Link ان معلومات کو بریل، آڈیو ٹیپ، بڑے پرنٹ اور کمیونٹی کی زبانوں میں فراہم کرے گا۔ مزید جاننے کے لیے برائے مہربانی 0330 303 0124 پر کال کریں۔



Privacy Impact Assessment Screening Questions

Carrying out a Privacy Impact Assessment [PIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

Please tick the applicable statement(s) below. Will your project involve:

- | | | |
|---|---|--|
| 1. A substantial change to an existing policy, process or system that involves personal information | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. A new collection of personal information | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. A new way of collecting personal information (for example collecting it online) | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. A change in the way personal information is stored or secured | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5. A change to how sensitive information is managed | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 6. Transferring personal information outside the EEA or using a third-party contractor | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 7. A decision to keep personal information for longer than you have previously | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 8. A new use or disclosure of personal information you already hold | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 9. A change of policy that results in people having less access to information you hold about them | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 10. Surveillance, tracking or monitoring of movements, behaviour or communications | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 11. Changes to your premises involving private spaces where clients or customers may disclose their personal information (reception areas, for example) | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you have answered 'Yes' to any of these points, please complete a full Privacy Impact Assessment. If you have answered 'No', you need take no further action in completing a Privacy Impact Assessment.

Equality Impact Assessment Screening Questions

Will the implementation of this policy have an impact on any of the following protected characteristics?

- | | | |
|-----------------------------------|---|-----------------------------|
| 1. Age | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Disability | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Gender reassignment | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Marriage and Civil Partnership | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5. Pregnancy and Maternity | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 6. Race | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 7. Religion or belief | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 8. Sex | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 9. Sexual orientation | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.